

RETURN DATE: March 14, 2017 : SUPERIOR COURT
FEDERAL NATIONAL MORTGAGE : J.D. OF HARTFORD
ASSOCIATION
VS. : AT HARTFORD
CRONIN, MICHAEL J., ET AL : FEBRUARY 1, 2017

COMPLAINT

1. On June 23, 2003, Michael J. Cronin and Jean F. Cronin owed Campbell Mortgage \$311,920.00, as evidenced by a promissory note for said sum dated on said date, and payable to the order of Campbell Mortgage with interest from said date, in monthly installments of principal and interest.

2. On said date, by a deed of that date, said Michael J. Cronin and Jean F. Cronin, to secure said note, mortgaged to Mortgage Electronic Registration Systems, Inc., as nominee for Campbell Mortgage the premises known as 47 Woodridge Circle, West Hartford, Connecticut, and described in Exhibit A attached hereto and made a part hereof.

3. Said mortgage deed was recorded on the West Hartford Land Records on June 24, 2003 in Volume 3237 at Page 75.

4. Mortgage Electronic Registration Systems, Inc. assigned said mortgage to Chase Home Finance LLC by an assignment dated December 28, 2007 and recorded January 9, 2008 in Volume 4228 at Page 283 of the West Hartford Land Records. Said mortgage was further

assigned to Federal National Mortgage Association by an assignment dated February 11, 2016 and recorded July 19, 2016 in Volume 5000 at Page 282 of the West Hartford Land Records.

5. Said mortgage was modified by a loan modification agreement dated December 7, 2011 and recorded December 26, 2011 in Volume 4631 at Page 97 of the West Hartford Land Records.

6. On or before December 22, 2016, the Plaintiff became and at all times since then has been the party entitled to collect the debt evidenced by said note and is the party entitled to enforce said mortgage. The unpaid balance due pursuant to the terms of said note is \$386,160.54, plus interest from July 1, 2016 and late charges and collection costs, that have not been paid although due and payable.

7. Said note and mortgage are now in default by virtue of nonpayment of the monthly installments of principal and interest due on August 1, 2016 and each and every month thereafter, and the Plaintiff has exercised its option to declare the entire balance of said note due and payable.

8. The following encumbrances of record upon the property sought to be foreclosed are prior in right to the Plaintiff's mortgage and are not affected by this action:

(a) Any taxes due the Town of West Hartford that remain outstanding and properly perfected as of the date hereof pursuant to applicable law.

9. On the aforementioned piece of property, the following interests are claimed which are subsequent to Plaintiff's said mortgage:

(a) The Defendant, Hop Energy, LLC dba Automatic TLC, may claim an interest in said premises by virtue of a judgment lien in the amount of \$851.67 dated August 27, 2007 and recorded September 4, 2007 in Volume 4176 at Page 155 of the West Hartford Land Records; and by virtue of a judgment lien in the amount of \$444.06 dated September 3, 2014 and recorded September 8, 2014 in Volume 4873 at Page 259 of the West Hartford Land Records.

(b) The Defendant, Connecticut Natural Gas Corporation, may claim an interest in said premises by virtue of a judgment lien in the amount of \$730.45 dated August 29, 2007 and recorded September 6, 2007 in Volume 4177 at Page 317 of the West Hartford Land Records.

(c) The Defendant, Capital One Bank (USA), N.A., may claim an interest in said premises by virtue of a judgment lien in the amount of \$22,286.86 dated October 28, 2009 and recorded November 12, 2009 in Volume 4443 at Page 372 of the West Hartford Land Records.

(d) The Defendant, Midland Funding LLC, may claim an interest in said premises by virtue of a judgment lien in the amount of \$6,845.89 dated May 12, 2010 and

recorded June 1, 2010 in Volume 4488 at Page 299 of the West Hartford Land Records.

(e) The Defendant, U.S. Equities Corp., may claim an interest in said premises by virtue of a judgment lien certificate in the amount of \$36,804.61 dated January 27, 2012 and recorded February 6, 2012 in Volume 4640 at Page 180 of the West Hartford Land Records,

10. Upon information and belief, the Defendant(s), Michael J. Cronin and Jean F. Cronin are the owner(s) of record and in possession of said premises.

WHEREFORE, The Plaintiff claims:

1. A foreclosure of said mortgage.
2. Immediate possession of the mortgaged premises.
3. A deficiency judgment. **No deficiency will be sought against any person whose obligation under the subject promissory note has been heretofore or hereafter discharged in bankruptcy.**
4. The appointment of a receiver to collect rents and profits accruing from the premises.
5. Reasonable attorney's fees and costs.
6. Such other relief and further equitable relief as may be required.

NOTICE: THE LAW FIRM OF BENDETT & MCHUGH, P.C. IS A DEBT COLLECTOR AND IS ATTEMPTING TO COLLECT A DEBT. ANY INFORMATION WE OBTAIN WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY WHICH DISCHARGED THIS DEBT, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.

This action is within jurisdiction of the Superior Court.

Dated at Farmington, Connecticut, February 1, 2017.

THE PLAINTIFF,
FEDERAL NATIONAL MORTGAGE
ASSOCIATION

By 

Dominick Neveux
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STATEMENT OF AMOUNT IN DEMAND

The amount, legal interest or property in demand is \$15,000.00 or more, exclusive of interest and costs.

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Exhibit A

A certain piece or parcel of land with the buildings and improvements thereon, situated in the Town of West Hartford, County of Hartford and State of Connecticut, known as 47 Woodridge Circle, and also known as Lot No. 2-A Woodridge Circle on a map entitled: "Revision of Lots 17, 18, 19, 20 Woodridge Addition Seven Property of Robert A. Garland, West Hartford, Conn. April 28, 1955 1" = 40' George R. Jenkinson, C.E.", which map is on file in the West Hartford Town Clerk's Office, to which reference is hereby made; said premises being more particularly bounded and described as follows:

- Northerly by Lot 1-A on said map, 210.87 feet ;
- Easterly along the curve made by the west line of a street called Woodridge Circle, 100 feet;
- Southerly by Lot 3-A on said map, 255.63 feet; and
- Westerly by land now or formerly described as Oak Ridge Tract, 99.29 feet